

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE GENERALI COVID-19 TRAVEL
INSURANCE LITIGATION

No. 20-md-2968

Hon. Judge John G. Koeltl

ECF Case

2611
**[PROPOSED] ORDER GRANTING PLAINTIFFS' UNANIMOUS MOTION TO
APPOINT INTERIM CO-LEAD COUNSEL, LIAISON COUNSEL, AND AN
EXECUTIVE COMMITTEE**

Having considered the motion of Cafferty Clobes Meriwether & Sprengel LLP, Carlson Lynch, LLP, and the Potts Law Firm to serve as Interim Co-Lead Counsel, Kirby McInerney to serve as Liaison Counsel, and Raizner Slania LLP, Sauder Schelkopf LLC, Scott + Scott Attorneys at Law LLP, and Zimmerman Reed LLP to serve as part of the Executive Committee (ECF Nos. 11-13) (the "Motion"),

IT IS HEREBY ORDERED THAT:


I. The Motion is GRANTED.

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II. This Court appoints the law firms of Cafferty Clobes Meriwether & Sprengel LLP, Carlson Lynch, LLP, and the Potts Law Firm to serve as Interim Co-Lead Counsel, Kirby by Daniel Koeltl McInerney to serve as Liaison Counsel, and an Executive Committee including the firms Raizner Slania LLP, Sauder Schelkopf LLC, Scott + Scott Attorneys at Law LLP, and Zimmerman Reed LLP. The primary attorneys for the Co-Lead Counsel law firms are (1) Bryan Clobes for Cafferty Clobes Meriwether & Sprengel LLP, (2) Jamisen Etzel for Carlson Lynch, LLP, and (3) Derek Potts for the Potts Law Firm. Co-Lead Counsel and Liaison Counsel shall be generally responsible for the following and will call on members of the Executive Committee to assist when and as needed:

- a. Determining and presenting in pleadings, motions, memoranda, oral argument, and such other fashion as may be appropriate, personally or by designee, to this Court and opposing parties, the position of plaintiffs on all matters arising during pretrial proceedings;
- b. Initiating, directing and conducting discovery on behalf of plaintiffs, consistent with the requirements of FED. R. CIV. P. 26, including written discovery and the examination of witnesses in depositions;
- c. Providing general coordination of the activities of plaintiffs' counsel and delegating specific tasks to other plaintiffs' counsel, or committees of plaintiffs' counsel, in a manner to ensure the orderly and efficient prosecution of this litigation and to avoid duplication or unproductive effort;
- d. Designating counsel who will act as Trial Counsel on behalf of plaintiffs;
- e. Initiating and conducting settlement negotiations on behalf of plaintiffs; and
- f. Establishing procedures for submission of and reviewing periodic time and expense reports of plaintiffs' counsel to determine if the time and expenses are being spent appropriately and for the benefit of plaintiffs' pretrial activities or be expressly authorized by this Court.
- g. Liaison Counsel will act as an intermediary with the Court and between defendants' and plaintiffs' counsel. Liaison Counsel will advise plaintiffs' counsel on the local rules and procedure of this Court and applicable laws in this District. Subject to the discretion of Co-Lead Counsel, Liaison Counsel will also work on substantive matters in this action.

IT IS SO ORDERED.

1/28/21


J. G. K. Selaf
U.S.D.J.